

**FEDERAL COMMUNICATIONS COMMISSION**  
**Washington, D.C. 20554**

In the Matter of	)	
	)	
Administration of the North	)	
American Numbering Plan	)	CC Docket No. 92-237
	)	

**NATIONAL TELECOMMUNICATIONS COOPERATIVE ASSOCIATION**  
**INITIAL COMMENTS**

The National Telecommunications Cooperative Association (NTCA)<sup>1</sup> hereby files its initial comments in response to the Federal Communications Commission's (Commission's or FCC's) May 17<sup>th</sup> Public Notice seeking comment in the above-captioned proceeding.<sup>2</sup> NTCA specifically recommends that the Commission accept NBANC's proposed 0.000043 contribution factor and \$13.7 million fund size estimate for funding North American Numbering Plan Administration activities for the period from July 2002 through June 2003. NTCA also recommends that the Commission waive the requirement that the NBANC Board hold four face-to-face meetings per year, in favor of NBANC's proposed minimum two face-to-face meetings and two telephone conference call meetings per year.

**I. THE PROPOSED 0.000043 CONTRIBUTION FACTOR SHOULD BE ACCEPTED**

NBANC proposes retaining the current 0.000043 contribution factor for the 2002-2003 fund period. This factor is sufficient because the Board intends to draw down the projected year-end 2001-2002 fund balance of \$7.68 million by an amount sufficient to alleviate the need for an

---

<sup>1</sup> NTCA is a non-profit corporation established in 1954 and represents 545 rate-of-return regulated rural telecommunications companies. NTCA members are full service telecommunications carriers providing local, wireless, cable, Internet, satellite and long distance services to their communities. All NTCA members are small carriers that are defined as "rural telephone companies" in the Communications Act of 1934, as amended (Act). They are dedicated to providing competitive modern telecommunications services and ensuring the economic future of their rural communities.

<sup>2</sup> *In the Matter of Administration of the North American Numbering Plan*, North American Numbering Plan Administration Contribution Factor and Fund Size for July 2002 through June 2003, CC Docket No. 92-237. National Telecommunications Cooperative Assn. 1 CC Docket 92-237  
Initial Comments DA 02-1167  
May 31, 2002

increase in the factor for the next several years.<sup>3</sup> Keeping the contribution factor at the same level as the previous plan year imparts stability to the carriers who must budget for annual payments to NBANC.

NTCA also endorses the continuation of the \$1 million contingency fund, which will be used to smooth out the hills and valleys in actual revenue collection and thus insure against the necessity to collect additional funds from carriers. Again, this adds stability by helping to guard against the possibility of carriers receiving unanticipated bills during the course of the plan year.

## **II. THE PROPOSED \$13.7 MILLION FUND SIZE SHOULD BE ACCEPTED**

NTCA believes that the proposed \$13.7 million fund size is reasonable and thus should be accepted. This sum will allow NBANC to fund its numbering administration activities. These include compensating the North American Numbering Plan (NANP) administrator for numbering plan and central office code administration, as well as making FCC-mandated payments for pooling administration, carrier audits, and Central Office Code Utilization Survey (COCUS) replacement.

Further, the NBANC Board asserts that the proposed fund size will allow NBANC to maintain its \$1 million contingency fund, intended to prevent the necessity of having to collect additional funds from contributors during the course of the funding year. A separate contingency of \$2 million will be held for pending and potential future requests from NeuStar, the North American Numbering Plan Administrator, as well as additional funding to develop, implement and administer the COCUS replacement tool. Building such safeguards into the funding plan increases the certainty for the contributors, an important factor in their budgeting and planning decisions.

---

<sup>3</sup> *Id.*, p.7.  
National Telecommunications Cooperative Assn.  
Initial Comments  
May 31, 2002

### **III. THE COMMISSION SHOULD GRANT A WAIVER OF THE REQUIREMENT THAT THE NBANC BOARD HOLD FOUR FACE-TO-FACE MEETINGS PER YEAR**

Currently, the NBANC Board of Directors is required to hold four in-person meetings annually in Washington, D.C.<sup>4</sup> In December 2000, however, NBANC petitioned for, and was granted, a waiver of this requirement,<sup>5</sup> and held three in-person meetings and five telephone conference call meetings in 2001. NBANC attests that all necessary Board business was adequately undertaken in this manner.<sup>6</sup> Further, now that the NBANC Board has gained additional experience in performing its actual oversight duties, it is the belief of the Board that even fewer face-to-face meetings will be necessary in the future.<sup>7</sup> Should circumstances change, however, NBANC bylaws allow special meetings to be called by the Chairperson, Vice Chair, Officers of the Corporation, or a majority of the Directors in office.<sup>8</sup>

Seven of thirteen sitting NBANC Board members (plus 2 NECA staffers) must come from outside of the D.C. area to attend Board meetings; three of these individuals must travel from outside of the U.S.<sup>9</sup> Holding two, rather than four, face-to-face meetings annually will significantly reduce NBANC Board members' associated travel costs. This, in turn, will directly benefit all of those members who pay into the fund, as the funds budgeted for Board meetings but not spent will be used to reduce future fund requirements.<sup>10</sup>

---

<sup>4</sup> *Administration of the North American Numbering Plan*, CC Docket No. 92-237, Third Report and Order, 12 FCC Rcd 23040 (1997), ¶ 84.

<sup>5</sup> *In the Matter of Petition for Expedited Waiver of North American Billing and Collection, Inc.*, CC Docket No. 92-237, NSD-L-00-271, DA 00-2916, 16 FCC Rcd 133 (2001).

<sup>6</sup> *In the Matter of Administration of the North American Numbering Plan*, p. 8.

<sup>7</sup> *Id.*

<sup>8</sup> *Id.*, p. 9.

<sup>9</sup> Two Board members must travel from Canada, one from the West Indies.

<sup>10</sup> *In the Matter of Administration of the North American Numbering Plan*, p. 9.

Thus, as loosening the face-to-face meeting requirement will not impair the Board's abilities to carry out their mandated duties and will reduce overall administrative expenses, NTCA favors granting NBANC a waiver of the four in-person meetings requirement.

#### **IV. CONCLUSION**

Based on the foregoing reasons, the Commission should approve the 0.000043 contribution factor and \$13.7 million fund size for the 2002-2003 fund year, and waive the requirement that the NBANC Board hold four face-to-face meetings per year.

Respectfully submitted,

NATIONAL TELECOMMUNICATIONS  
COOPERATIVE ASSOCIATION

By: /s/ L. Marie Guillory  
L. Marie Guillory

By: /s/ Daniel Mitchell  
Daniel Mitchell

Its Attorneys

4121 Wilson Boulevard, 10<sup>th</sup> Floor  
Arlington, VA 22203  
(703) 351-2000

May 31, 2002

## CERTIFICATE OF SERVICE

I, Gail C. Malloy, certify that a copy of the foregoing Initial Comments of the National Telecommunications Cooperative Association in CC Docket No. 92-237, DA 02-1167 was served on this 31st day of May 2002 by first-class, U.S. Mail, postage prepaid, to the following persons:

/s/ Gail C. Malloy  
Gail C. Malloy

Chairman Michael Powell  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW, Room 8B201  
Washington, D.C. 20554

Commissioner Kathleen Q. Abernathy  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW, Room 8-A204  
Washington D.C. 20554

Commissioner Kevin J. Martin  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W., Room 8-C302  
Washington, D.C. 20554

Commissioner Michael J. Copps  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W., Room 8-A302  
Washington, D.C. 20554

Qualex International  
Portals II  
445 12th Street, S.W.  
Room CY-B402  
Washington, D.C. 20554